

REMARKS:

In the foregoing amendments, claim 2 was amended to correct a typographical error, which was mentioned in an objection to this claim in section 4 on page 2 of the Official action. Therefore, applicant respectfully requests that the examiner reconsider and withdraw the objection to claim 2 that was set forth in the outstanding Office action.

Claims 1-3 remain pending in the application. Reconsideration and allowance of these claims are respectfully requested for at least the following reasons.

The Official action set forth a single prior art rejection of claims 1-3 under 35 U.S.C. § 102(e) as being anticipated by U.S. patent No. 6,828,963 of Rappoport. The statement of this rejection is set forth on pages 3-5 of the Official action. Applicant respectfully submits that the inventions defined in claims 1-3 are patentably distinguishable from the teachings of Rappoport within the meaning of 35 U.S.C. § 102(e) or 35 U.S.C. § 103(a) for at least the following reasons.

The differences between applicant's claimed invention and the teachings of Rappoport are significant, and therefore, these teachings cannot anticipate applicant's claimed invention. For example, the Official action stated that the first limitation in claim 1 of "the three-dimensional model immediately before the part is deleted or modified is stored" is interpreted as "the three-

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dimensional model is stored, right before each additional part stacked is modified or deleted." The Official action considered this a conventional "undo" feature. Applicant cannot agree with this position. Even if this limitation in applicant's claims is considered an "undo" feature, which applicant is not admit, applicant cannot find where the teachings of Rappoport suggest the use of such a limitation in the manner defined in present claims 1-3.

Rappoport proposes a computer-implemented exchange of data between two distinct computer aided design systems. Rappoport is not concerned with the use of a CAD system itself, which includes processing a three-dimensional model displayed on a screen to delete or modify parts of the model, as required in the present claims. For this reason, Rappoport cannot contemplate or suggest a step directed to a three-dimensional model displayed on a screen to delete or modify parts of the model and the subsequent steps for remedying problems associated with the deleting or modifying of parts of the model, as required in present claims 1-3.

Applicant cannot find where the teachings of Rappoport suggest that the stored immediately preceding three-dimensional model is shown on the same screen together with a non-reproducible three-dimensional model whose reproduction was stopped at the certain part, as required in present claims 1-3. Further, while the Official action referred to figures 9A-9C of Rappoport as suggesting that a difference in the shape and reference data between both of

the three-dimensional models is determined to extract shape and reference data which are missing from the reproducible part, and the extracted shape and reference data are converted into information indicating the cause of non-reproducibility and shown on the screen, applicant cannot find where Rappoport suggest this. Figure 9C of Rappoport proposes coordinates of the cursor, but no information concerning the cause of non-reproducibility. In applicant's claimed invention, the shape and reference data of the two models is compared, so that the omitted information (among other things) from the previous model can be shown on the display to assist the user in re-creating the previous model or correcting the current model. Since the invention proposed by Rappoport is concerned with interpreting data between different CAD systems, this information and the use thereof in the completely different procedures of applicant's claims would not and cannot be suggested by these teachings. For such reasons, applicant respectfully submits that the teachings of Rappoport do not disclose or suggest the inventions defined in present claims 1-3.

In other words, the Official action pointed out that the configurations set forth in paragraphs 3 and 4 in claim 1 of the present application (namely, the the stored immediately preceding three-dimensional model is...at the certain part, and a difference of the shape and reference data... and shown on the screen) are disclosed by Rappoport at column 13, lines 44-60. In column 13,

lines 44-60, Rappoport describes Fig. 9B which proposes that a screen shot 905 displays two windows, 909 and 910. However, the arrangements shown in Fig. 9B of Rappoport do not correspond to Fig. 10 of the present application and the corresponding subject matter defined in present claim 1. The model shown in window 909 of Rappoport is merely an enlarged view of the model shown in window 910 therein. These models do not correspond to "the stored immediately preceding three-dimensional model" or "the non-reproducible three-dimensional model whose reproduction was stopped at the certain part" as defined in claim 1 of the present application. For such reasons, applicant respectfully submits that the teachings of Rappoport do not contemplate or suggest the invention defined in present claim 1 or claims 2 and 3 that depend thereon.

Additionally, the limitation "information indicating the cause of non-reproducibility" in paragraph 4 of present claim 1 is not shown in the screen shot 905 of Rappoport. The teachings of Rappoport neither describe nor suggest such a display at column 13, lines 44-60 therein. Therefore, applicant respectfully submits that the teachings of Rappoport do not contemplate or suggest this limitation in present claim 1.

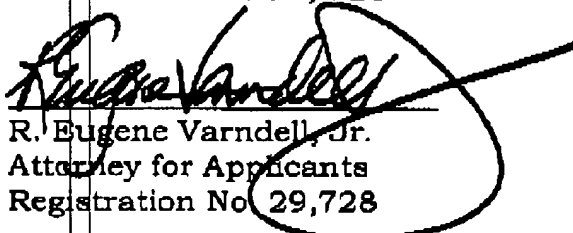
For the foregoing reasons, applicant respectfully submits that the teachings of Rappoport cannot contemplate or suggest the invention as set forth in claim 1 or the inventions set forth in claims 2 and 3 that depend

thereon within the meaning of 35 U.S.C. §102 or 35 U.S.C. §103. Therefore, applicant respectfully requests that the examiner reconsider and withdraw the rejection of these claims, and formally allow claims 1-3.

The foregoing is believed to be a complete and proper response to the Official action mailed August 4, 2005. While it is believed that all the claims in this application are in condition for allowance, should the examiner have any comments or questions, it is respectfully requested that the undersigned be telephoned at the below listed number to resolve any outstanding issues.

In the event this paper is not timely filed, applicant hereby petitions for an appropriate extension of time. The fee therefor, as well as any other fees which become due, may be charged to our deposit account No. 50-1147.

Respectfully submitted,
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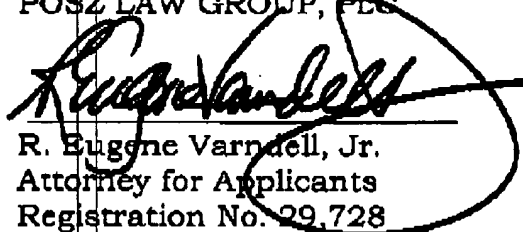
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I hereby certify that this correspondence (Response under 37 CFR 1.111, which totals 9 pages including this certificate) is being facsimile transmitted to the Patent and Trademark Office (facsimile No. 571-273-8300) on November 3, 2005.

Respectfully submitted,
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